

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SoClean, Inc.,)	
)	
Plaintiff,)	Case No.: 20-cv-06288
)	
v.)	Judge:
)	
Does 1-861, As Identified in Exhibit 1,)	Magistrate:
)	
Defendants.)	
)	

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff SoClean, Inc. files this Motion requesting leave to file Exhibit 1 to Plaintiff’s Complaint under seal because the document details and lists, respectively, (1) the Online Marketplace Accounts and Defendant Internet Stores (collectively, the “Defendant Internet Stores Information”) and (2) screenshot printouts showing the active Defendant Internet Store infringing listings (collectively, the “Screenshot Evidence”).

In this action, Plaintiff is seeking relief for trademark infringement and counterfeiting, false designation of origin, and violation of the Illinois Uniform Deceptive Trade Practices Act.

Due to the nature of the infringing activities, sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to service of process. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief.

We know it is likely Defendants will impede justice because Defendants participate in or operate a website, sellerdefense.cn, that monitors this District’s PACER filings and screens

for Plaintiff counsel's filings as well as all Trademark and Patent filings throughout the District. Without sealing these filings, Plaintiffs will have their remedies thwarted.

Once the Defendants have been served, the screenshot evidence can be unsealed.

Dated: October 22, 2020

Respectfully submitted,

By: /s/ Kevin Keener
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